

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Plaintiff the United States of America (“United States”), by and through its undersigned counsel, and James J. Jackson, III, *pro se*, hereby stipulate as follows:

1. The United States commenced this action by filing a complaint on July 20, 2018.

Dkt. # 1.

2. Service of process of the complaint, summons, and civil cover sheet upon James J. Jackson III was completed on August 1, 2018.

3. Based on the service date of August 1, 2018, the deadline for Mr. Jackson to respond to the complaint under Fed. R. Civ. P. 12(a)(a) is August 22, 2018.

1 4. Mr. Jackson requires additional time to obtain information from his prior attorney
2 in order to meaningfully respond to the complaint and requests a thirty (30) day extension of
3 time to answer or otherwise respond to the complaint. The United States has no objection to this
4 request for extension of time.

5 5. Fed. R. Civ. P. 6(b)(1) authorizes this court to grant an extension of time to
6 respond to a complaint for good cause shown. As the Ninth Circuit has recognized, Fed. R. Civ.
7 P. 6(b)(1) "is to be liberally construed to effectuate the general purpose of seeing that cases are
8 tried on the merits." *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1258-1259 (9th Cir.
9 2010). Thus, in the absence of bad faith, requests for an extension before the applicable deadline
10 has passed should normally be granted. *Id.*

11 6. The extension requested in this stipulation is necessary not because of any
12 dilatory action or unnecessary delay, but rather because of Mr. Jackson's efforts to provide a
13 more complete response to the complaint.

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1 WHEREFORE, for good cause shown, the parties respectfully request that the Court
2 approve this stipulation and allow Mr. Jackson an extension of thirty (30) days from August 22,
3 2018 or until September 21, 2018, to answer or otherwise respond to the complaint.

4 DATED this 17th day of August, 2018.

DATED this ____ day of August, 2018

5 RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General

6 *s/ Yen Jeannette Tran*
7 YEN JEANNETTE TRAN
Trial Attorney, Tax Division
8 U.S. Department of Justice
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9 Washington, D.C. 20044
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See next page for signature
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jamesjj3@gmail.com

10 *Pro Se*

11 Of Counsel:

12 ANNETTE L. HAYES
U.S. Attorney, Western District of
13 Washington

14 *Attorneys for the United States of America*

16 ORDER

17 The foregoing Stipulation for Extension of Time to Answer or Otherwise Respond to
18 Complaint is APPROVED. IT IS SO ORDERED.

19 Dated this 4th day of Sept., 2018.

20 
21 UNITED STATES DISTRICT JUDGE

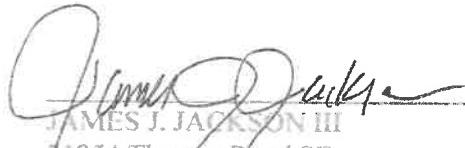
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DATED this 17 day of August, 2018

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Principal Deputy Assistant Attorney General

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Trial Attorney, Tax Division
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15 *Attorneys for the United States of America*

16 ORDER

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21 UNITED STATES DISTRICT JUDGE